

From: Travassos, Michelle L. </O=CVSCAREMARK/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=MLTRAVASSOS>
To: Dudley, Hilary B.
CC: Harrington, Nicole J.
BCC: michelle.travassos@cvshealth.com
Sent: 6/8/2016 6:45:07 AM
Subject: RE: WLM Regarding Store Level Blanket Policies
Attachments: Sup_wlm_blanket_3_15.docx

Hi Hilary,

Attorney-Client Privilege

Thanks,
Michelle

From: Dudley, Hilary B.
Sent: Tuesday, June 07, 2016 5:00 PM
To: Travassos, Michelle L.
Cc: Harrington, Nicole J.
Subject: FW: WLM Regarding Store Level Blanket Policies

Hi Michelle,

Attorney-Client Privilege

Thanks!

Hilary

From: Harrington, Nicole J.
Sent: Monday, February 16, 2015 4:34 PM
To: Ferguson, Betsy
Cc: Travassos, Michelle L.
Subject: FW: WLM Regarding Store Level Blanket Policies

Attorney-Client Privilege

Nicole Harrington | ♥CVS Health | Director of Pharmacy Professional Practice Standards | Office 401-770-4018 | Cell 603-657-8326 | Fax 401-652-2203 | nicole.harrington@cvscaremark.com

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From: Davis, Thomas G.
Sent: Monday, February 16, 2015 11:32 AM
To: Harrington, Nicole J.
Subject: WLM Regarding Store Level Blanket Policies

Nicci,

Please take a look at the attached.

Confidential

PLAINTIFFS TRIAL
EXHIBIT

P-06620 00001

CVS-MDLT3-000123571

Thanks,

Tom

TO: All Pharmacy Supervisors
CONTACT: Professional Practice Team
SUBJECT: Store Level "Blanket" Policies Concerning Controlled Substances

OVERVIEW:

In mid-February a workload manager task was delivered to all stores reinforcing their obligation to prevent controlled substances from being diverted or dispensed for non-medical purposes, while at the same time ensuring that patients with legitimate medical need continue to have access to these products. The diligent exercise of corresponding responsibility allows both of these objectives to be met.

Each and every controlled substance prescription must be individually evaluated one at a time by the pharmacist as part of his or her exercise of corresponding responsibility, to include:

- Evaluating each controlled substance prescription for the presence of red flags
- Performing due diligence to investigate each red flag that is identified (e.g. discussion with the patient, obtaining information from the prescriber, checking the state Prescription Monitoring Program, obtaining additional information, etc.) to determine if the red flags can be resolved
- Assessing the all the information collected and applying professional judgment in determining whether or not to fill the prescription

The expectation was clearly defined that stores must only follow company-approved policies. Stores are not authorized to adopt their own store-specific policies without the joint review and approval of their Pharmacy Supervisor, CVS Legal Department and Pharmacy Professional Services Department.

Stores were directed to immediately discontinue any store implemented blanket policy pertaining to controlled substances

We have encountered a limited number of occurrences where stores have unilaterally implemented unapproved "blanket" policies regarding controlled substances, including but not limited to the following examples:

- Refusal to fill any and all controlled substances prescriptions that are presented
- Implementation of a mandatory waiting period (example 24 or 48 hours) prior to filling any controlled substance prescription
- Store will not fill any controlled substance prescription issued by an out of state prescriber (even if permitted by state law)

Blanket policies such as the examples listed above do not reflect the diligent exercise of corresponding responsibility by the pharmacist, and can result in legitimate patients being denied access to medication.

As previously communicated, CVS fully supports decisions by its Pharmacists to not fill prescriptions, if in the sound exercise of their professional and clinical judgment they believe or suspect the prescription was not issued for a legitimate medical purpose by a practitioner acting in the usual course of professional practice. The pharmacist must however, ensure that they are individually exercising corresponding responsibility on each prescription presented and performing due diligence accordingly.

Pharmacy Supervisors are responsible to ensure that all stores are practicing according to CVS policy and do not have their own unapproved blanket policy in place.

ACTION NEEDED: During the March myStore Health store visit cycle Pharmacy Supervisors must complete the following review for each District store:

- Review the store workload manager task with each Pharmacy team: Click [HERE](#) to review and print
- Ensure each store does not have any blanket policies in place related to Controlled Substance dispensing that do not align to the posted CVS policies in the Pharmacy Operations Manual

- Understand if the pharmacy has a unique circumstance that you believe requires the implementation of a special policy in the store
- In the instance extenuating circumstances exist and a special policy is to be requested, you must review the specific details with your RM to gain alignment
 - If seeking approval, the request including specific circumstances and the content of the requested policy should be forwarded to the Professional Practices mailbox at: ProfessionalPracticeRetail@cvscaremark.com
 - The request will be reviewed by the Professional Practice group, Pharmacy Operations and Legal
 - The outcome of the review will be communicated back to the Pharmacy Supervisor once a decision has been determined

Do not mark this Work Load Manager assignment completed until each of the above steps has been completed for each District store